

1401 Main Street, Suite 900  
Columbia, SC 29201



Phone: (803) 737-0800  
[www.regulatorystaff.sc.gov](http://www.regulatorystaff.sc.gov)

[shudson@regstaff.sc.gov](mailto:shudson@regstaff.sc.gov)

*Shannon Bowyer Hudson*  
*Counsel for ORS*

March 8, 2018

**VIA E-FILEING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Procedural Schedule for Consolidated Docket Nos. 2017-207-E, 2017-305-E, and  
2017-370-E

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") provides the following response to the schedule proposed by South Carolina Electric & Gas Company ("SCE&G") for the above dockets on February 26, 2018.

SCE&G's proposed schedule has SCE&G's and Dominion's direct testimony for the 2017-370-E docket due August 15, 2018 and the other parties' responsive testimony due September 17, 2018.<sup>1</sup> The Joint Application and Petition is almost 700 pages<sup>2</sup>, and it is expected the direct testimony of SCE&G and Dominion will be voluminous. ORS respectfully submits that more time should be allowed between the time periods for the direct testimony due dates such that each party may thoroughly review testimony, issue discovery, receive discovery responses, and review discovery responses prior to the direct testimony due date.

Next, ORS respectfully requests that no party's testimony be due on a Monday. The schedule proposed by SCE&G has the responsive party direct testimony due on Monday, September 17, 2018. No other proposed due dates are on a Monday.

Last, Senate Bill 954 is a joint resolution that would require a Commission decision on the abandonment by December 21, 2018. Were the Commission to refrain from action on the ORS

<sup>1</sup> For the 2017-305-E docket, SCE&G proposes that ORS's direct testimony be filed August 15, 2018 with SCE&G's responsive testimony due September 17, 2018. For the 2017-207-E docket, SCE&G proposes that the Sierra Club and Friends of the Earth testimony be filed August 15, 2018 with SCE&G's responsive testimony due September 17, 2018.

<sup>2</sup> On January 12, 2018, SCE&G and Dominion filed a Joint Application and Petition in Commission Docket No. 2017-370-E.

request in Docket No. 2017-305-E, as proposed by SCE&G, the revised rates SCE&G currently charges pursuant to the Base Load Review Act are expected to be replaced by the rates derived from the Commission's abandonment decision depriving SCE&G's ratepayers of earlier rate relief. Given the time between now and December 21, 2018, the ratepayer relief sought by ORS in Docket No. 2017-305-E diminishes each month a decision is delayed and may become moot. This is particularly so since SCE&G has stated in an affidavit that it will utilize S.C. Code Ann. § 58-27-930 if the Commission grants ORS's request in the 2017-305-E docket.

In conclusion, ORS asks that the Commission not accept the proposed schedule put forth by SCE&G and accept the schedule proposed by ORS which provides ORS, intervenors and ratepayers sufficient opportunity to understand and address the issues in the Joint Application and Petition. However, ORS offers a date where the Other Party and ORS Direct Testimony is filed earlier to allow SCE&G additional time for rebuttal. The resulting dates for consideration are:

Activity	Dates Sent to the Commission by ORS on February 22, 2018	Alternate Dates to Allow SCE&G More Time for Rebuttal
Joint Applicant Direct Testimony Due	Tuesday, May 15, 2018	
Other Party and ORS Direct Testimony Due	Tuesday, September 25, 2018	Tuesday, September 11
Joint Applicant Rebuttal Testimony Due	Tuesday, October 9, 2018	Wednesday, October 10
Other Party and ORS Surrebuttal Testimony Due	Tuesday, October 23, 2018	Wednesday, October 24
Hearing Start Date	Monday, November 5, 2018	
Proposed Orders Due	Friday, November 30, 2018	
Order Due	Friday, December 21, 2018	

Sincerely,



Shannon B. Hudson

cc: Joseph M. Melchers, Esquire (via e-mail)  
F. David Butler, Esquire (via e-mail)  
All Parties of Record in Docket No. 2017-305-E (via e-mail)  
All Parties of Record in Docket No. 2017-207-E (via e-mail)  
All Parties of Record in Docket No. 2017-370-E (via e-mail)